

H. Rowan Gaither IV (HG-2245)
Reema S. Abdelhamid (RA-0085)
RICHARDS KIBBE & ORBE LLP
One World Financial Center
New York, New York 10281
Telephone: (212) 530-1800
Facsimile: (212) 530-1801

Counsel for Defendant Table Moose Media, LLC
d/b/a/ Indy Men's Magazine

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
GEORGE EDWARD McCain, an individual, :

Plaintiff, :

vs. :

RAHAL LETTERMAN RACING, LLC, an Ohio :
limited liability company, *et al.* :

Defendants. :

----- X

Index No.: 07-CV-5729

**NOTICE OF MOTION FOR
ADMITTANCE OF
MICHAEL H. GOTTSCHLICH
PRO HAC VICE**

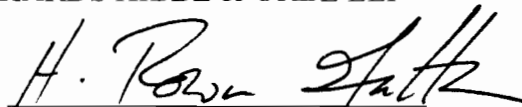
PLEASE TAKE NOTICE that, upon the accompanying Motion and Proposed Order to
Admit Michael H. Gottschlich *pro hac vice*, defendant Table Moose Media, LLC ("TMM"), by
its local counsel, Richards Kibbe & Orbe LLP, hereby moves this Court on submission for an

622779 # 25
5-0-8
7-7-07

Order pursuant to Local Civil Rule 1.3 of this Court, admitting Michael H. Gottschlich *pro hac vice* to represent TMM for all purposes in the above-captioned action.

Dated: New York, New York
August 2, 2007

RICHARDS KIBBE & ORBE LLP

By: 

H. Rowan Gaither IV (HG-2245)

Reema S. Abdelhamid (RA-0085)

One World Financial Center
New York, New York 10281-2702
(212) 530-1800

Counsel for Defendant Table Moose Media, LLC
d/b/a/ Indy Men's Magazine

Of Counsel

Michael H. Gottschlich
BARNES & THORNBURG LLP
11 South Meridian Street
Indianapolis, IN 46204
(317) 236-1313

H. Rowan Gaither IV (HG-2245)
Reema S. Abdelhamid (RA-0085)
RICHARDS KIBBE & ORBE LLP
One World Financial Center
New York, New York 10281
Telephone: (212) 530-1800
Facsimile: (212) 530-1801

Counsel for Defendant Table Moose Media, LLC
d/b/a/ Indy Men's Magazine

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X	
GEORGE EDWARD McCain, an individual,	:
	:
Plaintiff,	:
	:
vs.	:
	:
RAHAL LETTERMAN RACING, LLC, an Ohio	:
limited liability company, <i>et al.</i>	:
	:
Defendants.	:
	:
----- X	

Index No.: 07-CV-5729

**MOTION AND PROPOSED ORDER
FOR ADMITTANCE OF
MICHAEL H. GOTTSCHLICH
PRO HAC VICE**

H. ROWAN GAITHER IV, an attorney in good standing and duly admitted to practice in the State of New York and before this Court and a partner with the undersigned firm of Richards Kibbe & Orbe LLP, local counsel for defendant Table Moose Media, LLC ("TMM"), respectfully moves that Michael H. Gottschlich of the Indianapolis, Indiana law firm of Barnes & Thornburg be admitted to practice before this Court *pro hac vice* for all purposes of this case, and in support of this motion states as follows:

1. Mr. Gottschlich is a partner with the law firm of Barnes & Thornburg, with offices located in Indianapolis, Indiana. Mr. Gottschlich is a member in good standing of the bar of the Supreme Court of Indiana and all lower courts in Indiana. Mr. Gottschlich is also admitted to practice before the United States District Court for the Southern District of Indiana.

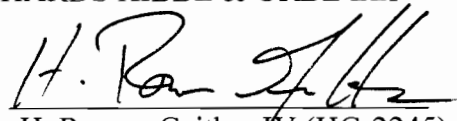
Attached hereto as Exhibit 1 is a certificate attesting to Mr. Gottschlich's good standing as a member of the Indiana bar.

2. Mr. Gottschlich is a member in good standing of the bar of California and he is admitted to practice before the United States District Court for the Central District of California. Attached hereto as Exhibit 2 is a certificate attesting to Mr. Gottschlich's good standing as a member of the California bar.

3. Mr. Gottschlich is on retirement status with the bar of the State of Illinois.

Dated: New York, New York
August 2, 2007

RICHARDS KIBBE & ORBE LLP

By: 
H. Rowan Gaither IV (HG-2245)
Reema S. Abdelhamid (RA-0085)
One World Financial Center
New York, New York 10281-2702
(212) 530-1800

Counsel for Defendant Table Moose Media, LLC
d/b/a/ Indy Men's Magazine

Of Counsel
Michael H. Gottschlich
BARNES & THORNBURG LLP
11 South Meridian Street
Indianapolis, IN 46204
(317) 236-1313

SO ORDERED:

UNITED STATES DISTRICT JUDGE

SUPREME COURT OF THE STATE OF INDIANA



Certification

STATE OF INDIANA, SS:

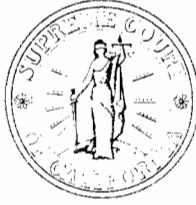
I, Kevin S. Smith, Clerk of the Supreme Court
of Indiana, do hereby certify that

MICHAEL HENRY GOTTSCHLICH

is a member of the bar of said Court since admission on
MAY 8th 2001, and is in good
standing therein.

GIVEN under my hand and the seal of said Court at Indianapolis,
Indiana, this 26th day of JULY, 20 07.

KEVIN S. SMITH
CLERK, SUPREME COURT OF INDIANA



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

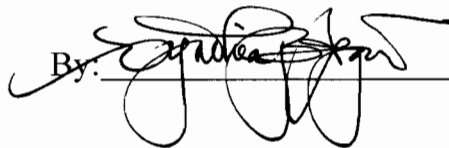
MICHAEL HENRY GOTTSCHLICH

I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that Michael Henry Gottschlich was on the 16th day of December, 1991, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court
on the 27th day of July, 2007.*

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By: 

Deputy Clerk

H. Rowan Gaither IV (HG-2245)
Reema S. Abdelhamid (RA-0085)
RICHARDS KIBBE & ORBE LLP
One World Financial Center
New York, New York 10281
Telephone: (212) 530-1800
Facsimile: (212) 530-1801

Counsel for Defendant Table Moose Media, LLC
d/b/a/ Indy Men's Magazine

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
GEORGE EDWARD McCain, an individual, :

Plaintiff, : Index No.: 07-CV-5729

vs. :

CERTIFICATE OF SERVICE

RAHAL LETTERMAN RACING, LLC, an Ohio :
limited liability co. *et al.* :

Defendants. :

----- x

CERTIFICATE OF SERVICE

I, Virginia Daugherty, certify:

1. That I am over the age of eighteen years, and am not a party to this action.
2. That on August 2, 2007, I caused to be served a copy of the foregoing (i) Notice of Motion for Admittance of Michael H. Gottschlic Pro Hac Vice and (ii) Motion and Proposed Order for Admittance of Michael H. Gottschlich Pro Hac Vice by U.S. mail, postage pre-paid, in a sealed envelope addressed to the following as indicated below:

John Anthony Pelosi
Pelosi, Wolf, Effron & Spates, LLP
Woolworth Building
233 Broadway, 22nd Floor
New York, NY 10279
(212) 334-3599
(212) 571-9149 (fax)

Counsel for Plaintiff George Edward McCain

George Cacoulidis
Attorney at Law
590 Madison Avenue
21st Floor
New York NY 10022

Counsel for Defendant American Lemans Series LLC

Jason M. Gonder
Milbank, Tweed, Hadley & McCloy LLP
One Chase Manhattan Plaza
New York, NY 10005

Counsel for Defendant BEA Systems, Inc.

Richard E. Haftel
Haftel & Silverman, P.C.
260 Madison Avenue, 18th Flr.
New York, NY 10016
(212) 832-3100
(212) 686-3151 (fax)

H. Ritchey Hollenbaugh
Carlile Patchen and Murphy, LLP
366 East Broad Street
Columbus, OH 43215
(614) 228-6135
(614) 221-0216 (fax)

David J. Pasternak
John W. Patton, Jr.
Pasternak, Pasternak and Patton
1875 Century Park East, Suite
Suite 2200
Los Angeles, CA 90067
(310) 553-1500
(310) 553-1540 (fax)

Counsel to Defendants Bobby Rahal Automotive Group and Rahal Letterman Racing, LLC

Carl E. Person
Carl E. Person - An Individual Practitioner
325 W. 45th St. - Suite 201
New York, NY 10036
(212) 307-4444
(212) 307-0247 (fax)

Counsel to Defendant Ellen Emerson

Karen Bekker
Satterlee Stephens Burke & Burke LLP
230 Park Avenue, 11th Flr.
New York, NY 10169
(212) 404-8720
(212) 686-3151 (fax)

Counsel for Defendant Gannett Co., Inc.

James Rosenfeld
Davis Wright, Termaine LLP
1633 Broadway
New York, NY 10019-6708

Counsel for Defendant Gawker Media LLC

Margaret A. Dale
Proskauer Rose LLP
1585 Broadway
New York, NY 10036-8299

Counsel for Defendant American Honda Motor Co., Inc.

Andrew B. Lachow
Deputy General Counsel
Time, Inc.
Time & Life Building
1271 Avenue of the Americas
New York, NY 10020-1393

Counsel for Defendants Time, Inc. d/b/a Sports Illustrated & People Magazine

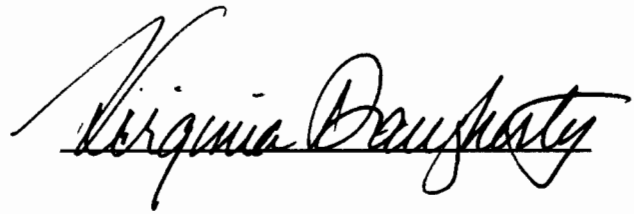
Richard Sotot
Hunton & Williams LLP
20 Park Avenue
New York, NY 10166-0136

Counsel for Times Publishing Company d/b/a St. Petersburg Times

Theresa M. Gillis
Jones Day
222 East 41st Street
New York, New York 10017-6702
(212) 326-3939
(212) 755-7306

**Counsel for Defendant The Timken
Company**

Dated: New York, New York
August 2, 2007

A handwritten signature in black ink, reading "Virginia Baugherty". The signature is written in a cursive style with a horizontal line underneath the name.